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PARAMOUNT BUILDING SOLUTIONS, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ROSA FREEDMAN, an individual,)	CASE NO.: 2:15-cv-00474-JAD-CWH
)	
Plaintiff,)	
)	
vs.)	STIPULATION AND ORDER TO EXTEND
)	DISCOVERY DEADLINES
THE VONS COMPANIES, INC., a Michigan)	(FIRST REQUEST)
corporation; PARAMOUNT BUILDING)	
SOLUTIONS, LLC, a Delaware corporation; YET)	
UNKNOWN EMPLOYEE AND/OR)	
EMPLOYEE; DOES I through V, inclusive,)	
)	
Defendants.)	
)	
THE VONS COMPANIES, INC.)	
)	
Cross-Claimant,)	
)	
vs.)	
)	
PARAMOUNT BUILDING SOLUTIONS and)	
DOES I through V, inclusive,)	
)	
Cross-Defendant.)	
)	

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STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between all parties to this action, under Federal Rule of Civil Procedure 26(f), LR 26-1(e) and LR 26-4, that the time limits for discovery be extended for ninety (90) days. Pursuant to Local Rule 6-1(b), the parties hereby represent that this is the first such discovery extension requested in this matter.

Therefore, the parties agree and stipulate as follows:

A. DISCOVERY COMPLETED

Disclosures:

1. Plaintiff's Early Case Conference Disclosure Statement, List of Documents and Witnesses, and NRCP 16.1 Pre-Trial Disclosures, dated April 23, 2015;
2. Plaintiff's First Supplemental Early Case Conference Disclosure Statement, List of Documents and Witnesses, and NRCP 16.1 Pre-Trial Disclosures, dated April 15, 2015;
3. Plaintiff's Second Supplemental Early Case Conference Disclosure Statement, List of Documents and Witnesses, and NRCP 16.1 Pre-Trial Disclosures, dated June 8, 2015;
4. Plaintiff's Third Supplemental Early Case Conference Disclosure Statement, List of Documents and Witnesses, and NRCP 16.1 Pre-Trial Disclosures, dated June 16, 2015;
5. Plaintiff's Fourth Supplemental Early Case Conference Disclosure Statement, List of Documents and Witnesses, and NRCP 16.1 Pre-Trial Disclosures, dated June 30, 2015;
6. Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Documents, dated March 31, 2015;
7. Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Documents, dated May 1, 2015;
8. Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits, dated May 8, 2015;
9. Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits, dated May 11, 2015;

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1 10. Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits,
2 dated May 12, 2015;

3 11. Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits,
4 dated May 14, 2015;

5 12. Defendant, The Vons Companies, Inc.'s Supplemental list of Witnesses and Exhibits,
6 dated May 19, 2015;

7 13. Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits,
8 dated May 26, 2015;

9 14. Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits,
10 dated May 29, 2015;

11 15. Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits,
12 dated June 24, 2015;

13 16. Defendant, Paramount Building Solutions, LLC's Initial List of Witnesses and Exhibits
14 dated July 13, 2015.

15 **Written Discovery:**

16 1. Defendant, The Vons Companies, Inc.'s Requests for Productions of Documents to
17 Plaintiff, dated March 27, 2015;

18 2. Defendant, The Vons Companies, Inc.'s Interrogatories to Plaintiff, dated March 27,
19 2015;

20 3. Plaintiff's Request for Production of Documents and Materials to Defendant, The Vons
21 Companies, dated April 20, 2015;

22 4. Plaintiff's Responses to Defendant, The Vons Companies, Inc.'s Interrogatories, dated
23 April 30, 2015;

24 5. Plaintiff's Responses to Defendant, The Vons Companies, Inc.'s Requests for Production
25 of Documents, dated April 30, 2015;

26 6. Defendant, The Vons Companies, Inc.'s Responses to Plaintiff's Request for Production
27 of Documents and Materials, dated May 15, 2015;

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7. Plaintiff's Request for Production of Documents and Materials to Defendant, Paramount Building Solutions, LLC, dated May 27, 2015;

8. Defendant, Paramount Building Solutions, LLC's Responses to Plaintiff's Requests for Production of Documents and Materials, dated July 13, 2015.

B. DISCOVERY THAT REMAINS TO BE COMPLETED

Deposition of Plaintiff, Plaintiff's medical providers, several percipient witnesses and representatives of Defendants remain to be taken. Initial expert disclosures, rebuttal expert disclosures, and depositions of experts as the parties may desire. Other discovery may prove necessary as new information regarding this case is obtained.

C. WHY DISCOVERY WAS NOT COMPLETED

The parties have conducted discovery including subpoenaing Plaintiff's medical records, exchanging documents and written discovery. However, Plaintiff is claiming substantial personal injuries and loss of future earning capacity. Due to scheduling conflicts and the amount of medical documentation which has been subpoenaed and is being reviewed, the parties have been unable to schedule the deposition of Plaintiff or necessary percipient witnesses prior to the expert disclosure deadline. Such deposition testimony is necessary for the experts to complete their analysis.

D. PROPOSED SCHEDULE FOR COMPLETION OF DISCOVERY

The following is a proposed schedule for the completion of discovery:

1. Last day to complete discovery:

Current Setting: September 14, 2015

Proposed Extension: December 14, 2015

2. Last day for rebuttal expert disclosures:

Current Setting: August 17, 2015

Proposed Extension: November 16, 2015

3. Last day to file dispositive motions:

Current Setting: October 14, 2015

Proposed Extension: January 11, 2016

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4. Last day to file Joint Pre-Trial Order:

Current Setting: November 13, 2015

Proposed Extension: February 11, 2016

There are currently no issues which the parties are aware regarding discovery of electronically stored information or claims or privilege/protection of trial preparation materials.

There are currently no changes which should be made in the limitations on discovery imposed by the federal or local rules of practice and no additional orders that this Court should issue at the time.

DATED this 20th day of July, 2015.

DATED this 20th day of July, 2015.

THE GALLIHER LAW FIRM

KAHLE & ASSOCIATES

By:

/s/ [Signature]
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THE VONS COMPANIES, INC.

DATED this 20th day of July, 2015.

SPRINGEL & FINK LLP

By:

/s/ [Signature]
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PARAMOUNT BUILDING SOLUTIONS,
LLC

IT IS SO ORDERED.

DATED July 24, 2015.

[Signature]
UNITED STATES MAGISTRATE JUDGE